

CHRISTOPHER CHIOU
Acting United States Attorney
Nevada Bar No. 14853
BIANCA R. PUCCI
Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
Bianca.Pucci@usdoj.gov
Attorneys for the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JONATHAN ROBERT RISSE-SANTOS,

Defendant.

Case No. 2:21-mj-00283-EJY

**Stipulation to Continue Preliminary
Hearing (First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney, and Bianca R. Pucci, Assistant United States Attorney, counsel for the United States of America, and Daniel Lippmann, Esq., counsel for the defendant Jonathan Robert Risse-Santos, that the Preliminary Hearing currently scheduled on Thursday, April 15, 2021, at 4:00 p.m., be vacated and continued to a time convenient to the Court but no sooner than 60 days. This Stipulation is entered into for the following reasons:

1. The parties require additional time to discuss the potential for a Pre-Indictment negotiation.
2. Counsel for the defendant will require additional time to review and investigate discovery and meet with the client to discuss the details prior to proceeding.
3. The Defendant is in custody and does not object to the continuance.

1 4. The parties agree to the continuance.

2 5. Additionally, denial of this request for continuance could result in a miscarriage of
3 justice.

4 6. The additional time requested by this stipulation is excludable in computing the
5 time within which the defendant must be indicted and the trial herein must commence pursuant
6 to the Speedy Trial Act, 18 U.S.C. §§ 3161(b) and 3161(h)(7)(A), considering the factors under
7 18 U.S.C. § 3161(h)(7)(B)(i) and (iv).

8 7. This is the first request for continuance filed herein.

9
10 DATED this 13th day of April, 2021.

11
12 CHRISTOPHER CHIOU
13 Acting United States Attorney

14 /s/ Bianca R. Pucci
15 BIANCA R. PUCCI
Assistant United States Attorney

/s/ Daniel Lippmann
DANIEL LIPPMANN
Attorney for Defendant:
JONATHAN ROBERT RISSE-SANTOS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JONATHAN ROBERT RISSE-SANTOS,

Defendant.

Case No. 2:21-mj-00283-EJY

ORDER

Based on the Stipulation of counsel, good cause appearing therefore:

IT IS HEREBY ORDERED that the Preliminary Hearing currently scheduled on Thursday, April 15, 2021 at the hour of 4:00 p.m., be vacated and continued to June 14, 2021 at the hour of 4:00 p.m. in Courtroom 3B.

DATED this 13th day of April, 2021.


Elayna J. Youchah
United States Magistrate Judge